

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

FRANKLIN RAMOS SANCHEZ,  
a/k/a "Frank,"

Defendant.

INDICTMENT

14 CRIM006

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 2/7/15

COUNT ONE

The Grand Jury charges:

1. From at least in or about December 2010, up to and including in or about January 2014, in Colombia and elsewhere, FRANKLIN RAMOS SANCHEZ, a/k/a "Frank," the defendant, whose point of entry into the United States will be in the Southern District of New York, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that FRANKLIN RAMOS SANCHEZ, a/k/a "Frank," the defendant, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, intending and knowing that such substance would be unlawfully imported into the United States and into waters within a distance of 12

Judge Buchwald

miles of the coast of the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 812 and 959(a).

3. It was further a part and an object of the conspiracy that FRANKLIN RAMOS SANCHEZ, a/k/a "Frank," the defendant, and others known and unknown, would and did import into the United States from a place outside thereof a controlled substance, in violation of Title 21, United States Code, Sections 812 and 952(a).

4. The controlled substance involved in the offense was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 960(b)(1)(B).

#### Overt Acts

5. In furtherance of the conspiracy, and to effect the illegal objects thereof, the following overt acts, among others, were committed:

a. On or about April 3, 2013, FRANKLIN RAMOS SANCHEZ, a/k/a "Frank," the defendant, met with two men in the vicinity of Cali, Colombia, to discuss, among other things, an arms-for-narcotics transaction.

b. On or about April 16, 2013, a co-conspirator not named as a defendant herein ("CC-1") participated in a

telephone conversation regarding, among other things, an arms-for-narcotics transaction.

c. On or about September 13, 2013, SANCHEZ met with two men in the vicinity of Cali, Colombia, to discuss, among other things, an arms-for-narcotics transaction.

d. On or about October 22, 2013, CC-1 met with a man in the vicinity of Barranquilla, Colombia, to discuss, among other things, an arms-for-narcotics transaction.

e. On or about October 22, 2013, SANCHEZ participated in a telephone conversation regarding, among other things, an arms-for-narcotics transaction.

f. On or about November 22, 2013, in the vicinity of Barranquilla, Colombia, CC-1 provided the man he met on October 22, 2013 with approximately 17 kilograms of cocaine. (Title 21, United States Code, Sections 812, 952, 959, 960 & 963.)

#### FORFEITURE ALLEGATION

6. As a result of committing the controlled substance offense charged in Count One of this Indictment, FRANKLIN RAMOS SANCHEZ, a/k/a "Frank," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the offense and any and all property used or intended to be used in any manner or part

to commit and to facilitate the commission of the offense charged in Count One of this Indictment.

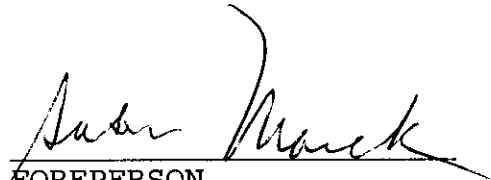
Substitute Assets Provision

7. If any of the above-described forfeitable property, as a result of any act or omission of FRANKLIN RAMOS SANCHEZ, a/k/a "Frank," the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Sections 853(p) and 970, to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 853 & 970.)



FOREPERSON



PREET BHARARA  
United States Attorney

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA

- v. -

FRANKLIN RAMOS SANCHEZ,  
a/k/a "Frank,"

Defendant.

---

INDICTMENT

14 Cr.

(21 U.S.C. §§ 812, 853, 952, 959, 960,  
963 & 970; 18 U.S.C. § 2.)

PREET BHARARA

United States Attorney.

A TRUE BILL

  
Foreperson.

---

11/7/14 Filed ~~Superseding~~ Indictment

Filed Arrest Warrant

J-dac Nathan